Law Offices of Jae Y. Kim, LLC One University Plaza, Suite 212 Hackensack, New Jersey 07601

E-mail: jkim@jyklaw.com Tel: (201) 488-8600

Fax: (201) 488-8633

Attorneys for plaintiff:

Eric R. Perkins in his capacity as Chapter 7

Trustee for the bankruptcy estate of

Ji Soon Jang and Soon Rye Jang

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY NEWARK VICINAGE

In the Matter of:

JI SOON JANG and SOON RYE JANG

debtors.

ERIC R. PERKINS in his capacity as Chapter 7 trustee for the bankruptcy estate of Ji Soon Jang and Soon Rye Jang,

plaintiff,

v.

9 9 9

JI SOON JANG, SOON R. JANG, MONTCLAIR PIZZA HOUSE, INC., and WOODY JANG and JOHN DOES 1-10,

defendant.

Chapter 7

Case No. 15-10131(JKS)

Adv. Pro. No. 16-1003

# NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY

Plaintiff Eric R. Perkins in his capacity as Chapter 7

Trustee for the bankruptcy estate of Ji Soon Jang and Soon Rye

Jang ("Trustee") in this case proposes a compromise, or to

Case 15-10131-JKS Doc 58 Filed 08/31/17 Entered 09/01/17 00:38:16 Desc Imaged Certificate of Notice Page 2 of 5

Case No. 15-10131(JKS)::Adv. Pro. No. 16-1003 Notice Of Proposed Compromise or Settlement Of Controversy

settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

### Address of the Clerk:

United States Bankruptcy Court 50 Walnut Street Newark, NJ 07102

If an objection is filed, a hearing will be held before the Honorable John K. Sherwood on September 26, 2017, at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 3D, 50 Walnut Street, Newark, NJ 07102 (hearing to be scheduled for at least 28 days from the date of the filing of the notice).

If no objection is filed the clerk will enter a Certification of No Objection and the settlement may be completed as proposed.

#### Nature of action:

1 . .

Adversary proceeding against debtors, Woody Jang and Montclair Pizza House to deny discharge pursuant to 11 U.S.C. 727(a)(3) and 727(a)(4) and avoid fraudulent transfers pursuant to 11 USC §544(b)(1), §548(a)(1)(A)&(B) and §550(a)(1)&(2).

# Pertinent terms of settlement:

Ji Soon Jang, Soon R. Jang, Woody Jang and Montclair Pizza House, Inc., shall be jointly and severally liable to Trustee

Case 15-10131-JKS Doc 58 Filed 08/31/17 Entered 09/01/17 00:38:16 Desc Imaged Certificate of Notice Page 3 of 5

Case No. 15-10131 (JKS)::Adv. Pro. No. 16-1003 Notice Of Proposed Compromise or Settlement Of Controversy

and shall pay directly to Trustee the sum total of eleven thousand two hundred and fifty dollars (\$11,250.00) within 14 days after this settlement has been approved by the bankruptcy court.

Objections must be served on, and requests for additional information directed to:

Name:

Jae Y. Kim, Esq.

c/o Law Offices of Jae Y. Kim, LLC

Address:

One University Plaza, Suite 212

Hackensack, New Jersey 07601

Telephone No.: (201) 488-8600

E-mail: jkim@jyklaw.com

Respectfully submitted,

LAW OFFICES OF JAE Y. KIM, L.L.C. attorneys for plaintiff Eric Perkins in his capacity as Chapter 7 trustee for the bankruptcy estate of debtor Ji Soon Jang, Soon R. Jang

By: <u>/s/ Raymond Marelic</u>
Raymond Marelic, Esq.

DATED: August 28, 2017

# Case 15-10131-JKS Doc 58 Filed 08/31/17 Entered 09/01/17 00:38:16 Desc Imaged

Certificate of Notice Page 4 of 5
United States Bankruptcy Court
District of New Jersey

In re: Ji Soon Jang Soon Rye Jang Debtors Case No. 15-10131-JKS Chapter 7

### **CERTIFICATE OF NOTICE**

District/off: 0312-2 User: admin Page 1 of 2 Date Rcvd: Aug 29, 2017 Form ID: pdf905 Total Noticed: 26

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Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on
Aug 31, 2017.
                                                     7 Irene Place, Wayne, NJ U/4/0 JJ__
The Place, The Street, Ste. 1500,
db/jdb
                                   Soon Rye Jang,
                 +Ji Soon Jang,
aty
                 +McElroy, Deutsch, Mulvaney & Carpenter, LLP,
                   Newark, NJ 07102-4560
cr
                 +HUDSON CITY SAVINGS BANK
                                                 Phelan Hallinan & Schmieg, PC,
                                                                                      400 Fellowship Road,
                                                                                                                Suite 100,
                   Mt. Laurel, NJ 08054-3437
                                 LAw Offices of Jae Y. Kim, LLC,
                                                                      One University Plaza,
                                                                                                   Suite 212,
sp
                 +Jae Y. Kim,
                   Hackensack, NJ 07601-6206
                 +American Express, P.O. Box 1201,
American Express Centurion Bank, c o Becket and Lee LLF,
+CITI Bank, P.O. Box 769004, San Antonio, TX 78245-9004
PO Box 71083, Charlotte,
515261739
                 +American Express, P.O. Box 1270,
                                                          Newark, NJ 07101-1270
515545924
                                                                                      POB 3001, Malvern, PA 19355-0701
515261735
                 +CITI Bank,
                 Capital One Bank (USA), N.A.,
                                                      PO Box 71083, Charlotte, NC 28272-1083
515605734
                                                      Glen Allen, VA 23060-6293
                 +Capitol One, 4851 Cox Road,
515261741
                                    c/o Richard J. Boudreau & Associates LLC,
515261743
                 +Citizens Bank,
                                                                                       6 Manor Parkway,
                   Salem, NH 03079-2841
                 +District of Columbia, P.O. Box 37038, Washington, D.C. 20013-7038
+Ki Bok Kim, 19 Williamsburg Court, Wayne, NJ 07470-2939
+LEAF, P.O. Box 644006, Cincinnati, OH 45264-4006
515261744
515261749
515261750
                 +Phelan, Hallinan & Diamond, P.C., Frank J. Keenan, Esq.,
515261737
                                                                                       400 Fellowship Road, Suite 100,
                   Mt. Laurel, NJ 08054-3437
                 +TD Bank, P.O. Box 9001921,
515261738
                                                    Louisville, KY 40290-1921
                                                               60 Motor Parkway,
515261746
                 +TJ Maxx,
                             c/o Foster Garbus & Garbus,
                                                                                      Commack, NY 11725-5710
                 +US BANK, PO BOX 5229, CINCINNATI OH 45201-5229 (address filed with court: US Bank, P.O. Box 108,
515261747
                ++US BANK,
                                                                              St. Louis, MO 63166)
                 +Wells Fargo, P.O. Box 6426, Carol Stream, IL 60197-6426
515261748
515554138
                 +Wells Fargo Bank, N.A.,
                                              Business Direct Division, P.O. Box 29482,
                                                                                                 Phoenix, AZ 85038-9482
Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
                  E-mail/Text: usanj.njbankr@usdoj.gov Aug 30 2017 00:55:58
                                                                                       U.S. Attorney, 970 Broad St.,
                   Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
                 +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Aug 30 2017 00:55:54
                                                                                              United States Trustee,
sma
                                                              1085 Raymond Blvd.,
                   Office of the United States Trustee,
                                                                                       One Newark Center, Suite 2100,
                 Newark, NJ 07102-5235
+E-mail/PDF: gecsedi@recoverycorp.com Aug 30 2017 01:00:28
515261740
                                                                                        Banana Republic,
                 5900 North Meadows Drive, Grove City, OH 43123-9541 +E-mail/Text: bankruptcy@cavps.com Aug 30 2017 00:56:14
515450253
                                                                                    Cavalry SPV I, LLC,
                   500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-1340
                 +E-mail/Text: bk.notifications@jpmchase.com Aug 30 2017 00:55:42
515261742
                   P.O. Box 29505, Phoenix, AZ 85038-9505
515261745
                 +E-mail/Text: administration@gatestoneco.com Aug 30 2017 00:55:43
                                                                                               FIA Card Services, N.A.,
                   c/o Gatestone, P.O. Box 101928, Birmingham, AL 35210-6928
                 +E-mail/Text: camanagement@mtb.com Aug 30 2017 00:55:41
515261736
                                                                                    Hudson City Savings Bank,
                                            Paramus, NJ 07652-1478
                   West 80 Century Road,
                                                                                                       TOTAL: 7
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\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 31, 2017 Signature: /s/Joseph Speetjens

District/off: 0312-2 User: admin Page 2 of 2 Date Rcvd: Aug 29, 2017

Form ID: pdf905 Total Noticed: 26

#### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 28, 2017 at the address(es) listed below:

Andrew L. Spivack on behalf of Creditor HUDSON CITY SAVINGS BANK nj.bkecf@fedphe.com Ari Jacobson on behalf of Defendant Soon R Jang ajacobson@songlawfirm.com, jhong@songlawfirm.com Ari Jacobson on behalf of Defendant Montclair Pizza House, Inc. ajacobson@songlawfirm.com, jhong@songlawfirm.com Ari Jacobson on behalf of Defendant Woody Jang ajacobson@songlawfirm.com, jhong@songlawfirm.com Ari Jacobson on behalf of Defendant Ji Soon Jang ajacobson@songlawfirm.com, jhong@songlawfirm.com on behalf of Creditor M&T BANK dcarlon@kmllawgroup.com, Denise E. Carlon bkgroup@kmllawgroup.com Eric R. Perkins eperkins@mdmc-law.com, slahr@mdmc-law.com,nj42@ecfcbis.com, gdelmonaco@mdmc-law.com Eric R. Perkins on behalf of Trustee Eric R. Perkins eperkins@mdmc-law.com, gdelmonaco@mdmc-law.com;tcolombini@mdmc-law.com;slahr@mdmc-law.com Howard Z. Myerowitz on behalf of Debtor Ji Soon Jang hmyerowitz@songlawfirm.com, jhong@songlawfirm.com Howard Z. Myerowitz on behalf of Defendant Woody Jang hmyerowitz@songlawfirm.com, jhong@songlawfirm.com Howard Z. Myerowitz on behalf of Joint Debtor Soon Rye Jang hmyerowitz@songlawfirm.com, jhong@songlawfirm.com Jae Y. Kim on behalf of Spec. Counsel Jae Y. Kim jkim@jyklaw.com, rmarelic@jyklaw.com;jyklaw@yahoo.com Ji Hyun Ryu on behalf of Defendant Ji Soon Jang jhong@songlawfirm.com, qyang@songlawfirm.com on behalf of Defendant Soon R Jang jhong@songlawfirm.com, qyang@songlawfirm.com on behalf of Debtor Ji Soon Jang kchung@songlawfirm.com, qyang@songlawfirm.com on behalf of Joint Debtor Soon Rye Jang kchung@songlawfirm.com, Ji Hyun Ryu Kyong Chung Chung qyang@songlawfirm.com Raymond Marelic on behalf of Trustee Eric R. Perkins rmarelic@jyklaw.com,

Raymond Marelic on behalf of Plaintiff Eric Perkins rmarelic@jyklaw.com,

jkim@jyklaw.com;rmarelic@gmail.com

jkim@jyklaw.com;rmarelic@gmail.com

TOTAL: 18